
IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE AT KNOXVILLE

United States of America,)	
)	
v.)	Docket Number: 3:07-cr-42
)	Phillips / Guyton
Keith Hicks,)	
)	
Defendant.)	
)	

MOTION FOR DETENTION HEARING AND RELEASE

The defendant, Keith Hicks, by and through undersigned counsel, and pursuant to Title 18, United States Code, Section 3142, hereby requests a Detention Hearing on Monday, July 16, 2007 at 9:30am. Further, Mr. Hicks respectfully request that this Court release Mr. Hicks on an unsecured bond and electronic monitoring. For grounds, Mr. Hicks would show:

1. Mr. Hicks is charged in a one count Indictment with conspiracy to distribute and possess with intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine hydrochloride in violation of 21 U.S.C. § 841(a)(1).
2. Mr. Hicks is a life-long resident of East Tennessee, particularly Newport, Tennessee.
3. Mr. Hicks' mother, Earnestine Hicks, has agreed to have Mr. Hicks live with her while on bond and will monitor and ensure his appearance in court as well as his compliance with other release conditions. Her address is 137 Brookfield Drive, Newport, Tennessee 37821. Her phone number 423-625-2084.

4. Mr. Hicks will be employed by Lois' Country Kitchen, owned and operated by Lois Wilson. The address is 1140 West Highway 2570, Newport, Tennessee 37821. The phone number is 423-625-4950.

5. Mr. Hicks agrees to electronic monitoring while on federal release.

6. The United States, through Assistant United States Attorney David Jennings, has no objection to Mr. Hicks' release under the conditions as herein stated.

7. No other legal/criminal action is pending against Mr. Hicks in any state or federal court.

For the reasons stated herein, Mr. Hicks respectfully request a detention hearing and release.

Respectfully submitted on July 12, 2007.

McKELLAR ROSKIND, LLP

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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing document was electronically filed on April 17, 2007. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

By: s/Andrew S. Roskind